

# Federal Defenders OF NEW YORK, INC.

Southern District  
52 Duane Street-10th Floor, New York, NY 10007  
Tel: (212) 417-8700 Fax: (212) 571-0392

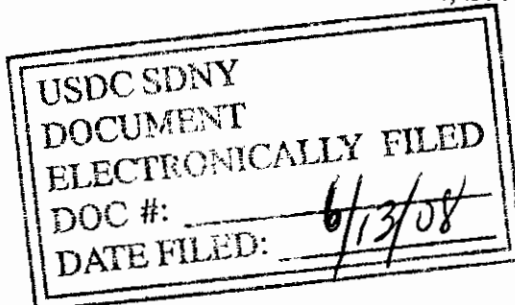
Leonard F. Joy  
Executive Director

June 12, 2008

Southern District of New York  
John J. Byrnes  
Attorney-in-Charge

**BY FAX**

Honorable Loretta A. Preska  
United States District Judge  
Southern District of New York  
500 Pearl Street, Room 1320  
New York, New York 10007



**Re: United States v. Martin Amoah**  
**07 Cr. 974 (LAP)**

Dear Judge Preska:

I write on behalf of my client, Martin Amoah, to respectfully request that the Court modify Mr. Amoah's bail conditions to allow him to travel home to Ghana between June 25, 2008 and July 15, 2008. I have conferred with Assistant United States Attorney David O'Neil, who consents to this request on behalf of the Government. I have also conferred with Jason Lerman, Mr. Amoah's Pretrial Services Officer, who likewise consents to this request.

On August 21, 2007, the Honorable James C. Francis imposed the following bail conditions:

- a \$150,000 personal recognizance bond co-signed by three financially responsible persons;
- travel restricted to the Eastern and Southern Districts of New York;
- surrender of any travel documents (and no new applications); and
- strict pretrial supervision.

On September 17, 2007, the Honorable Frank Maas modified Mr. Amoah's bail conditions to reduce the number of signatories on the bond to two, rather than three.

We now respectfully ask that these conditions be modified to allow Mr. Amoah to return home to Ghana to visit his mother and ten-year-old daughter. Mr. Amoah's mother, Rebecca Ackon, and his daughter, Angela Amoah, were both injured in a car accident on November 30, 2007. Mr. Amoah's mother was hospitalized for an extended period and continues to have significant health problems. His daughter has been in and out of the hospital recently with pain from a neck injury. Mr. Amoah is desperate to return to Ghana to provide comfort to his daughter and mother. While in Ghana, he would reside at his mother's address. The defense would provide this address, the house phone number, and Mr. Amoah's flight itinerary to Pretrial

Honorable Loretta A. Preska  
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June 12, 2008  
Page 2

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07 Cr. 974 (LAP)

Services before Mr. Amoah's departure. Mr. Amoah will also need to retrieve his passport temporarily for the trip.

Although Mr. Amoah's case is ongoing, the parties have reached a tentative plea agreement that involves Mr. Amoah pleading to a count of making a false statement in violation of 18 U.S.C. § 1001(a). The Government is currently drafting up the papers.

Respectfully submitted,

*Fiona Doherty*

Fiona Doherty  
Attorney for Martin Amoah  
(212) 417-8734

SO ORDERED:

HONORABLE LORETTA A. PRESKA  
UNITED STATES DISTRICT JUDGE

cc: Mr. David A. O'Neil, Esq.  
Assistant United States Attorney (by fax)

Mr. Jason Lerman  
Pretrial Services Officer (by fax)

*Upon the express representation  
that the government and Pretrial  
Services consent, defendant  
may travel to Ghana  
between June 25 and July 15  
Defendant shall provide contact  
information to pretrial  
services.*  
*SO ORDERED.*  
*J. Paul, USDJ*  
*6-13-08*